

John P. Mertens (14522)  
Joseph G. Pia (9945)  
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Salt Lake City, UT 84101  
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[Joe.Pia@piahoyt.com](mailto:Joe.Pia@piahoyt.com)

*Attorneys for Defendants*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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DAVID ZAMORA and GUMECINDO  
ZAMORA

Plaintiffs,

vs.

DOUGLAS QUEZADA, et al.,

Defendants.

**MOTION TO COMPEL DEPOSITIONS  
OF DAVID AND GUMECINDO  
ZAMORA**

Case No: 2:22-cv-00616-DBB-DBP

Judge: David Barlow

Magistrate Judge Dustin B. Pead

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and DUCivR 37-1, Defendants Douglas Quezada, Lauren Quezada, and HQC, LLC, by and through undersigned counsel, move the Court for an order compelling the Plaintiffs to attend depositions. Discovery closes today without agreement on a date for these depositions.

Plaintiff David Zamora's deposition was cut short on September 9, due to his arrest for a sexual assault committed against Defendant Lauren Quezada.<sup>1</sup> Gumecindo

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<sup>1</sup> The assault was committed prior to this lawsuit, not during the deposition.

Zamora refused to attend his scheduled deposition the following day, and in an effort to cooperate, Defendants agreed to allow him to not appear.

The parties agreed that the depositions would go forward on October 28 and 29, only to have these dates cancelled by Plaintiffs. Months have passed, two stipulated extensions have been sought and granted, and the Plaintiffs have failed and refused to provide dates for their depositions. The most recent communication was on November 15, 2024, when counsel for Plaintiffs stated, "I'll get you dates for David and Gume's depositions." On November 22, 2024, Defendants' counsel followed up without response.

This lawsuit is 100% based on Plaintiff's verbal allegations against Defendants. There is not a single written document in the universe of discovery produced to date supporting any of the primary allegations (that any Defendant agreed to buy stock for Plaintiffs, that any money transferred to Defendants was for this purpose, that Defendants agreed to secure any investment with gold). There is not even a single written document suggesting that Plaintiffs and Defendants discussed Aurora Cannabis, or that even contains this name in any conversation.<sup>2</sup>

Given that this case boils down to a swearing contest, Defendants seek the in-person deposition of plaintiff Gumecindo Zamora, and the completion of the in-person deposition of plaintiff David Zamora, taken in the district in which the Plaintiffs chose to file suit. In the alternative, Defendants at least need a deposition via zoom of Gumecindo Zamora, and an in-person deposition of David Zamora, who now lives in Utah.

Attached to this Motion are:

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<sup>2</sup> Defendant Douglas Quezada did invest funds in this company, so there are documents containing this name that were never transmitted between the parties until discovery.

- i) The original deposition notices for September 9<sup>th</sup> and 10<sup>th</sup>. The parties agreed to switch the order so that David would go before Gumecindo, contrary to the manner of the notices.
- ii) The Notice of Deposition of Gumecindo Zamora set for October 28, 2024.
- iii) The Notice of Resumed Deposition of David Zamora set for October 30, 2024.
- iv) An email exchange whereby the parties attempted to work out this dispute. The most recent two emails are November 15<sup>th</sup> where Plaintiffs' counsel promises deposition dates, and November 22<sup>nd</sup> where Defendants' counsel prompts a response. The undersigned certifies that this constitutes the parties' attempts to meet and confer on this topic.

For the reasons set forth above, Defendants ask the Court to order David and Gumecindo Zamora to attend depositions on dates to be set by the Court in consultation with the parties at a hearing or telephone conference to resolve this motion.

Dated this 2<sup>nd</sup> day of December 2024.

PIA HOYT, LLC

/s/ John P. Mertens

Joseph G. Pia

John P. Mertens

*Attorneys for Defendants*

## EXHIBIT i

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[Joe.Pia@piahoyt.com](mailto:Joe.Pia@piahoyt.com)

*Attorneys for Defendants*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

---

DAVID ZAMORA and GUMECINDO  
ZAMORA

Plaintiffs,

vs.

DOUGLAS QUEZADA, et al.,

Defendants.

**NOTICE OF DEPOSITION  
OF GUMECINDO ZAMORA**

Case No: 2:22-cv-00616-DBB-DBP

Judge: David Barlow

Magistrate Judge Dustin B. Pead

PLEASE TAKE NOTICE that Defendant Douglas Quezada (“**Defendant**”), will take the deposition of Gumecindo Zamora (“**Gumecindo**”), by oral examination before a certified short-hand stenographic reporter for the purposes of discovery of evidence in the above-captioned case pursuant to Rules 26 and 30 of the *Utah Rules of Civil Procedure*, at the following date and location:

DATE & TIME	LOCATION
September 9, 2024, beginning at 9:00 a.m.	PIA HOYT, LLC 170 S. Main Street, Suite 1100 Salt Lake City, Utah, 84101

The deposition will commence at **9:00 am MST** and will continue until completed.

DATED this 4<sup>th</sup> day of September 2024.

PIA HOYT, LLC

/s/ John P. Mertens

Joseph G. Pia

John P. Mertens

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2024, a true and correct copy of the foregoing **NOTICE OF DEPOSITION OF GUMECINDO ZAMORA** was filed using the Court's electronic filing system, which will serve a notice of filing upon all counsel of record.

/s/ Melanie Buervenich

Paralegal

John P. Mertens (14522)  
Joseph G. Pia (9945)  
PIA HOYT LLC  
170 South Main Street, Suite 1100  
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Email: [jmertens@piahoyt.com](mailto:jmertens@piahoyt.com)  
[Joe.Pia@piahoyt.com](mailto:Joe.Pia@piahoyt.com)

*Attorneys for Defendants*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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DAVID ZAMORA and GUMECINDO  
ZAMORA

Plaintiffs,

vs.

DOUGLAS QUEZADA, et al.,

Defendants.

**NOTICE OF DEPOSITION  
OF DAVID ZAMORA**

Case No: 2:22-cv-00616-DBB-DBP

Judge: David Barlow

Magistrate Judge Dustin B. Pead

PLEASE TAKE NOTICE that Defendant Douglas Quezada (“**Defendant**”), will take the deposition of David Zamora (“**David**”), by oral examination before a certified short-hand stenographic reporter for the purposes of discovery of evidence in the above-captioned case pursuant to Rules 26 and 30 of the *Utah Rules of Civil Procedure*, at the following date and location:

DATE & TIME	LOCATION
September 10, 2024, beginning at 9:00 a.m.	PIA HOYT, LLC 170 S. Main Street, Suite 1100 Salt Lake City, Utah, 84101



The deposition will commence at **9:00 am MST** and will continue until completed.

DATED this 4<sup>th</sup> day of September 2024.

PIA HOYT, LLC

/s/ John P. Mertens

Joseph G. Pia

John P. Mertens

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2024, a true and correct copy of the foregoing **NOTICE OF DEPOSITION OF DAVID ZAMORA** was filed using the Court's electronic filing system, which will serve a notice of filing upon all counsel of record.

/s/ Melanie Buervenich  
Paralegal

## EXHIBIT ii

John P. Mertens (14522)  
Joseph G. Pia (9945)  
PIA HOYT LLC  
170 South Main Street, Suite 1100  
Salt Lake City, UT 84101  
Phone: (801) 350-9000  
Email: [jmertens@piahoyt.com](mailto:jmertens@piahoyt.com)  
[Joe.Pia@piahoyt.com](mailto:Joe.Pia@piahoyt.com)

*Attorneys for Defendants*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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DAVID ZAMORA and GUMECINDO  
ZAMORA

Plaintiffs,

vs.

DOUGLAS QUEZADA, et al.,

Defendants.

**NOTICE OF DEPOSITION  
OF GUMECINDO ZAMORA**

Case No: 2:22-cv-00616-DBB-DBP

Judge: David Barlow

Magistrate Judge Dustin B. Pead

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PLEASE TAKE NOTICE that Defendant Douglas Quezada (“**Defendant**”), will take the deposition of Gumecindo Zamora (“**Gumecindo**”), by oral examination before a certified short-hand stenographic reporter, with the assistance of a Spanish-language interpreter, for the purposes of discovery of evidence in the above-captioned case pursuant to Rules 26 and 30 of the *Utah Rules of Civil Procedure*, at the following date and location:

DATE & TIME	LOCATION
October 28, 2024, beginning at 9:00 a.m.	PIA HOYT, LLC 170 S. Main Street, Suite 1100 Salt Lake City, Utah, 84101

The deposition will commence at **9:00 am MST** and will continue until completed.

DATED this 24<sup>th</sup> day of October 2024.

PIA HOYT, LLC

/s/ John P. Mertens

Joseph G. Pia

John P. Mertens

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2024, a true and correct copy of the foregoing **NOTICE OF DEPOSITION OF GUMECINDO ZAMORA** was filed using the Court's electronic filing system, which will serve a notice of filing upon all counsel of record.

/s/ Melanie Buervenich

Paralegal

## EXHIBIT iii

John P. Mertens (14522)  
Joseph G. Pia (9945)  
PIA HOYT LLC  
170 South Main Street, Suite 1100  
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[Joe.Pia@piahoyt.com](mailto:Joe.Pia@piahoyt.com)

*Attorneys for Defendants*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

---

DAVID ZAMORA and GUMECINDO  
ZAMORA

Plaintiffs,

vs.

DOUGLAS QUEZADA, et al.,

Defendants.

**NOTICE OF RESUMED DEPOSITION  
OF DAVID ZAMORA**

Case No: 2:22-cv-00616-DBB-DBP

Judge: David Barlow

Magistrate Judge Dustin B. Pead

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PLEASE TAKE NOTICE that Defendant Douglas Quezada ("**Defendant**"), will resume the deposition of David Zamora ("**David**"), by oral examination before a certified short-hand stenographic reporter for the purposes of discovery of evidence in the above-captioned case pursuant to Rules 26 and 30 of the *Federal Rules of Civil Procedure*, at the following date and location:



DATE & TIME	LOCATION
October 30, 2024, beginning at 2:00 p.m.	PIA HOYT, LLC 170 S. Main Street, Suite 1100 Salt Lake City, Utah, 84101,

The deposition will commence at **2:00 pm MST** and will continue until completed.

DATED this 24<sup>th</sup> day of October 2024.

PIA HOYT, LLC

/s/ John P. Mertens

Joseph G. Pia

John P. Mertens

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 24, 2024, a true and correct copy of the foregoing **NOTICE OF RESUMED DEPOSITION OF DAVID ZAMORA** was filed using the Court's electronic filing system, which will serve a notice of filing upon all counsel of record.

/s/ Melanie Buervenich

Paralegal

EXHIBIT iv

**Melanie Buervenich**

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**From:** John Mertens  
**Sent:** Friday, November 22, 2024 4:52 PM  
**To:** Matthew K. Strout  
**Cc:** Melanie Buervenich; Steve Kelson; Nediha Hadzikadunic  
**Subject:** RE: Quezada/Zamora - Discovery Proposal

Matthew,

Can you share with me any justification that I might consider in forming our position? Obviously, I'm going to argue to the Judge that once I offered to stipulate that the documents established what you wanted them to establish, the only purpose in looking through them was to drive up costs. Absent some other justification that you provide, I expect the Court will agree with me.

Also, when can your clients appear for a deposition? Let's get these depositions on the calendar and get this case teed up for trial.

Thanks,  
John



**John P. Mertens**

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---

**From:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>  
**Sent:** Friday, November 15, 2024 4:58 PM  
**To:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>  
**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>  
**Subject:** RE: Quezada/Zamora - Discovery Proposal

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Hi John:

I advised my clients on the pros and cons of taking (and not taking) a stipulation through multiple conversations, and they decided against it. I assure you it has nothing to do with any desire to drive up costs.

I'll get you dates for David and Gume's depositions.

Sincerely,

Matthew

Matthew K. Strout  
Attorney



Christensen & Jensen, P.C.  
Office 801.323.5000  
Fax 801.355.3472  
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257 East 200 South, Suite 1100  
Salt Lake City, Utah 84111  
[www.chrisjen.com](http://www.chrisjen.com)

---

**From:** John Mertens <[JMertens@piahojt.com](mailto:JMertens@piahojt.com)>

**Sent:** Wednesday, November 13, 2024 4:14 PM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahojt.com](mailto:mbuervenich@piahojt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahojt.com](mailto:NHadzikadunic@piahojt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

Matt,

I'm interested to know why you'd rather we spend the money looking at transactions instead of taking the win on this issue. If the Court orders us to produce these documents and we refuse, the most likely sanction would be that the Court will simply determine the issue in your favor and give you the result I've already offered. It suggests that the motivation is to run up the bill for us, rather than to discover information relevant to the case. If you have some other explanation, feel free to share it.

Why don't you give me dates for Gume that you are available, and that he can travel here if your motion to move the deposition to Zoom is unsuccessful? We'll schedule David for the following day (or just move to him once Gume is done if that takes less than the full day).

If we're going to Court, there are a number of cancellation fees related to Gume's last-minute deposition cancellation, and the cancellation of the previously-scheduled second deposition of Gume.

John



**John P. Mertens**

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Suite 1100 SLC 84101

---

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notify me by telephone (801-350-9017) or by e-mail ([jmertens@piahoyt.com](mailto:jmertens@piahoyt.com)) immediately. Nothing herein or in the message above is intended to create an attorney-client relationship, unless such relationship otherwise exists.

---

**From:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>  
**Sent:** Wednesday, November 13, 2024 4:02 PM  
**To:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>  
**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>  
**Subject:** RE: Quezada/Zamora - Discovery Proposal

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Hi John:

After much discussion with my clients, they are declining to accept the stipulation or make a counter.

David will appear in person for his deposition. When do you want to do that?

Looks like we are going to have the court sort out the written discovery issues and the location of Gume's deposition.

Please advise when Lauren and HQC are available to be deposed this month. I am available Nov. 21, 22, 26, and 27. Please consider this email a demand for production of your clients' supplemental discovery responses/documents prior to the depositions. Please let me know by this Friday whether your clients will comply.

Sincerely,

Matthew

Matthew K. Strout  
Attorney



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---

**From:** Matthew K. Strout  
**Sent:** Friday, November 8, 2024 4:50 PM  
**To:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>  
**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>  
**Subject:** RE: Quezada/Zamora - Discovery Proposal

Hi John:

I've talked to my clients and they told me they will have their answer to your offer by Monday.

Matthew K. Strout  
Attorney



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---

**From:** John Mertens <[JMertens@piahojt.com](mailto:JMertens@piahojt.com)>

**Sent:** Thursday, November 7, 2024 9:07 AM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahojt.com](mailto:mbuervenich@piahojt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahojt.com](mailto:NHadzikadunic@piahojt.com)>

**Subject:** Re: Quezada/Zamora - Discovery Proposal

Not yet.

Nediha - can you go through the HQC statements and add up the transfers to Lauren from the first cashier's check until about a month after the last one? Matt, you can check our work on that.

John



**John P. Mertens**

170 South Main Street

Suite 1100 SLC 84101

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---

**From:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Sent:** Wednesday, November 6, 2024 10:31 PM

**To:** John Mertens <[JMertens@piahojt.com](mailto:JMertens@piahojt.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahojt.com](mailto:mbuervenich@piahojt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha

Hadzikadunic <[NHadzikadunic@piahojt.com](mailto:NHadzikadunic@piahojt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

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Hi John:

Do you have a number for the amount you propose that Lauren be potentially joint and severally liable up to?

Matthew K. Strout  
Attorney



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---

**From:** John Mertens <[JMertens@piahojt.com](mailto:JMertens@piahojt.com)>

**Sent:** Friday, November 1, 2024 12:36 PM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahojt.com](mailto:mbuervenich@piahojt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha

Hadzikadunic <[NHadzikadunic@piahojt.com](mailto:NHadzikadunic@piahojt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

Matt,

I left a message a bit ago. Are we on track for a resolution? I do have the privilege log information ready.

John

---

**From:** John Mertens

**Sent:** Wednesday, October 30, 2024 9:12 PM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahojt.com](mailto:mbuervenich@piahojt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha

Hadzikadunic <[NHadzikadunic@piahojt.com](mailto:NHadzikadunic@piahojt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

Matt,

I think the stipulated order would look like this: (We would fill in the blank with the amounts that Lauren received. I haven't added it up.)



Plaintiffs contend that Defendants Douglas Quezada, Lauren Quezada, and HQC, LLC are liable for the tort of Conversion (Third Cause of Action) and Unjust Enrichment/Quantum Meruit (Fourth Cause of Action). In the event that Plaintiffs prove at trial or by motion that either Douglas Quezada or HQC, LLC are liable under either the Third or Fourth Cause of Action, liability will be joint and several as to Douglas Quezada and HQC, LLC. Liability will also be joint and several as to Lauren Quezada up to the amount of \$\_\_\_\_\_.

Plaintiffs contend that funds were provided by Plaintiffs to Douglas Quezada and were deposited in an account belonging to HQC, LLC. The parties agree that no funds were used to purchase stock in Aurora Cannabis for the benefit of Plaintiffs. Based on these stipulations, the parties will not conduct further discovery into what the funds in HQC, LLC's accounts were spent on or who they were transferred to.

John

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---

**From:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>  
**Sent:** Tuesday, October 29, 2024 2:58 PM  
**To:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>  
**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>  
**Subject:** RE: Quezada/Zamora - Discovery Proposal

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I need to discuss this with my clients. It would also be helpful to see a proposed stipulated order, if that is something you could put together.

Regarding David's deposition tomorrow, we should table that until we work through this. That would be the result regardless due to the automatic stay of the deposition that would result per DUCivR 30-1(d) if I file a motion for a protective order today.

**Matthew K. Strout**  
Attorney



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**From:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>

**Sent:** Tuesday, October 29, 2024 2:24 PM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

Matt,

There are a number of transfers from HQC, LLC to Lauren. We would need to go add them up and see what of the Zamora cashier's checks were ultimately transferred to Lauren. She would be liable for that amount jointly and severally with Doug/HQC if there is any liability on the 3<sup>rd</sup> and 4<sup>th</sup> causes of action.

John



**John P. Mertens**

170 South Main Street  
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**From:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Sent:** Tuesday, October 29, 2024 2:11 PM

**To:** John Mertens <[JMertens@piahoyt.com](mailto:JMertens@piahoyt.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahoyt.com](mailto:mbuervenich@piahoyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahoyt.com](mailto:NHadzikadunic@piahoyt.com)>

**Subject:** RE: Quezada/Zamora - Discovery Proposal

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Hi John:

Can you elaborate on what you mean by "to the extent of any transfers to Lauren...."?

**Matthew K. Strout**  
Attorney



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**From:** John Mertens <[JMertens@piahyt.com](mailto:JMertens@piahyt.com)>

**Sent:** Tuesday, October 29, 2024 9:14 AM

**To:** Matthew K. Strout <[matthew.strout@chrisjen.com](mailto:matthew.strout@chrisjen.com)>

**Cc:** Melanie Buervenich <[mbuervenich@piahyt.com](mailto:mbuervenich@piahyt.com)>; Steve Kelson <[Steve.Kelson@chrisjen.com](mailto:Steve.Kelson@chrisjen.com)>; Nediha Hadzikadunic <[NHadzikadunic@piahyt.com](mailto:NHadzikadunic@piahyt.com)>

**Subject:** Quezada/Zamora - Discovery Proposal

Matt,

Here is my proposal on discovery. We can reduce it to a stipulated order if you'd like.

1. Supplemental response re: Privilege Log to be completed this week.
2. As to other discovery responses:
  - a. Defendants and Plaintiffs stipulate that, in the event that Plaintiffs prove any liability under the Third and Fourth Causes of Action, that liability will be joint and several between HQC and Doug, and to the extent of any transfers to Lauren, to Lauren as well. Defendants will provide no further financial information or information about transactions.
  - b. This resolves all discovery issues with HQC, and all issues with Lauren's discovery other than RFP 3 and 6 (communications).
3. All remaining depositions complete in the week of Nov. 18<sup>th</sup>. I have the whole week, other than a pretrial conference on Wed at 9am.
4. You choose between 4 zoom or 4 in person depositions that week.

John



**John P. Mertens**

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2024, a true and correct copy of the foregoing **MOTION TO COMPEL DEPOSITIONS** was filed using the Court's electronic filing system, which will serve a notice of filing upon all counsel of record.

/s/ Melanie Buervenich  
Paralegal